

LAW OFFICE OF DENNIS J. DUNCAN, LLC  
599 BLOOMFIELD AVENUE  
BLOOMFIELD, NEW JERSEY 07003  
PH: (973) 743-7100 FAX: (973) 743-7101  
ATTORNEYS FOR DEFENDANT,  
RICHARD "VINCE" LAMB

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY - TRENTON**

CHARLES NOVINS, ESQ. P.C. and	:	Civil Action No. 09-CV-5354-AET-DEA
CHARLES NOVINS, Personally,	:	
	:	
Plaintiffs,	:	<b>MOTION TO COMPELL</b>
v.	:	<b>PLAINTIFFS TO PROVIDE</b>
	:	<b>MORE SPECIFIC ANSWERS TO</b>
	:	<b>INTERROGATORIES</b>
Kevin A. Cannon, et al.	:	
	:	
Defendants	:	
	:	
	:	RETURNABLE: August 16, 2010
	:	
	:	<b>ORAL ARGUMENT REQUESTED</b>

To:

Charles Novins, Esq.  
54 East Water Street  
Toms River, New Jersey 08754

Joseph A. Manzo, Esq.  
37 Rose Lane  
Rockaway, New Jersey 07866

**TAKE NOTICE** that the undersigned counsel for Counterclaimant Richard Vince Lamb shall move before the Honorable Judge on Monday August 16, 2010, at the United States Federal Court House in Trenton, New Jersey, for an order directing plaintiffs to provide more specific answers to counterclaimant Lamb's interrogatories with in a specific period of time else plaintiffs answer shall be stricken.

Counsel shall rely upon the declaration of Dennis Duncan and the letter brief accompanying this Notice.

A form of proposed order is annexed hereto.

The undersigned requests oral argument.

**Law Office of Dennis J. Duncan, LLC**  
Attorneys for Defendant,  
Richard “Vince” Lamb

By: /s/ Dennis J. Duncan  
Dennis J. Duncan

Dated: July 12, 2010